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Patricia A. Mahoney
Senior Counsel, Regulatory Matters

July 23, 1997

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Mr. William Caton
Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

DOCKET FILE COPY ORIGINAL

Re: ET Docket No. 95-18

Dear Mr. Caton:

Transmitted herewith, on behalf of Iridium LLC, are an original and nine copies of its "Reply Comments" in the above-referenced proceeding.

Should any questions arise concerning this matter, please contact the undersigned.

Very truly yours,

IRIDIUM LLC

A handwritten signature in cursive script that reads "Patricia A. Mahoney".

Patricia A. Mahoney
Senior Counsel, Regulatory Matters

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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In the Matter of)
)
Amendment of Section 2.106 of the)
Commission's Rules to Allocate) ET Docket No. 95-18
Spectrum at 2 GHz for Use by the)
Mobile-Satellite Service)

Directed to: The Commission

REPLY COMMENTS

Iridium LLC ("Iridium") hereby respectfully submits these Reply Comments in response to various comments that were recently filed in connection with the Further Notice of Proposed Rule Making, FCC 97-93 (released March 14, 1997) ("FNPRM"), in the above-captioned proceeding:

Iridium generally supports and agrees with a number of the points made in the "Further Comments of the MSS Coalition." For the reasons stated by the MSS Coalition, Iridium agrees that the Commission should obtain further information regarding the spectrum needs of Broadcast Auxiliary Service ("BAS") operators currently located in the proposed MSS uplink band, including information concerning the technical and financial feasibility of BAS licensees employing digital technology before MSS service is initiated in markets where BAS demand is heaviest, before the Commission decides upon a channelization plan for BAS operations.

As Iridium has previously stated¹ in this proceeding, Iridium agrees that a sunset period should be adopted and agrees with the MSS Coalition that the sunset date for relocation of the fixed services ("FS") should be January 1, 2005. As the MSS Coalition and other commentors have noted, 2 GHz FS operators have been on notice since 1992 that they would eventually have to vacate the radio spectrum that has been allocated to MSS. Iridium agrees with the MSS Coalition that a sunset date of January 1, 2005 best balances the interests of FS and MSS operators.

Iridium also agrees that henceforth the Commission should issue new BAS licenses in the 1990-2025 MHz band subject to a condition requiring relocation as of January 1, 2000, at the BAS licensee's own expense, as proposed by the MSS Coalition.

With respect to application of the PCS relocation rules to MSS, Iridium notes that the MSS Coalition believes that any negotiation period should begin once an FS operator has made a showing of actual harmful interference, rather than when the Commission accepts applications for MSS licenses. Iridium agrees that the period should not run from acceptance of the applications. At the very least, the period should not begin until the FCC has granted the MSS applications. Until that time, there will be no way of knowing for sure how many MSS operators will be participating in the reimbursement of relocation costs, how much spectrum each will be using, and whether and to what extent they can share spectrum with each other and with the existing users.

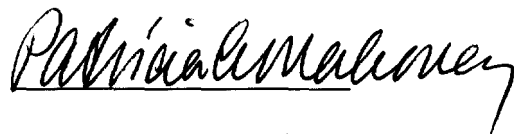
¹ Iridium has actively participated in this proceeding as a potential applicant to provide MSS service in the 2 GHz band.

With respect to the issues concerning how the costs are to be shared by MSS operators, Iridium agrees with the "Comments of TRW Inc." to the extent that TRW maintains that all MSS operators that will be operating at 2 GHz should share the expenses of moving the existing users.

Finally, it should be noted that, since the filing of the comments in this further stage of this proceeding, the Commission has opened a filing window (until August 21, 1997) for applications and letters of intent for 2 GHz. Many of the issues raised in the FNPRM would be better addressed after a review of the proposals and system designs of the applications and letters of intent at 2 GHz, as TRW suggests in its Comments. The Commission should consider withholding any action on a number of its proposals until it has had an opportunity to review the MSS 2 GHz applications and letters of intent and to adopt specific service rules for MSS at 2 GHz. Indeed, the Commission may want to consider seeking supplemental comments in this proceeding after the 2 GHz filing window closes.

Respectfully submitted,

IRIDIUM LLC,

A handwritten signature in black ink, appearing to read "Patricia Mahoney", written in a cursive style.

Patricia Mahoney, Senior Counsel,
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July 23, 1997

CERTIFICATE OF SERVICE

I, Denise Spragley, do hereby certify that a copy of the foregoing **Reply Comments** has been sent, via first class mail, postage prepaid, (or as otherwise indicated) on this 23rd day of July 1997 to the following:

- | | | | |
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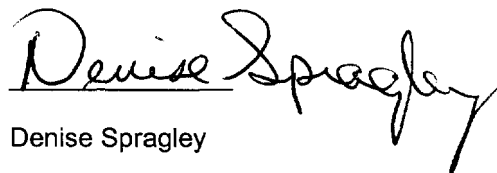
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